



National Association of  
American **Veterans**<sup>TM</sup>

*Serving Our Nation's Service Members and Veterans  
with Honor and Respect*

February 21, 2018

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: WC Docket Nos. 17-287, 11-42, 09-197**

Dear Ms. Dortch:

As advocates and supporters of the military and veteran community<sup>1</sup>, we are writing to express our concerns with the proposed changes to the Lifeline program set forth in the recently-issued Lifeline Notice of Proposed Rulemaking and Notice of Inquiry. We believe many of these proposals would have devastating consequences for millions of service members and veterans who rely on Lifeline service to access health care resources, find and keep jobs, participate in educational programs, and keep in touch.

The Lifeline program helps provide an essential service to many individuals who have served as well as many active members of the Armed Forces and their families. According to data at the Commission, it is estimated that 10-13 percent of current wireless Lifeline beneficiaries are veterans of U.S. military service. Many active service members depend on federal benefits programs like Lifeline. NAAV has helped many service members sign up for federal programs they qualify for, including Lifeline. While we do not have specific numbers, we do know that millions of military families qualify and participate. For example, last year, families spent about \$67 million in food stamps at commissaries, according to the Department of Agriculture, the agency that administers SNAP. Also, about 23,000 active-duty service members rely on SNAP benefits, according to the 2013 Census.

These same service members deserve to be able to participate in and benefit from a strong, viable, Lifeline program. For example, Lifeline provides important access to health care and also enables the medical community (health care providers) to utilize telecommunications in order to provide care to low-income Lifeline customers to whom access would be difficult and, in some cases, impossible. One

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<sup>1</sup> The National Association of American Veterans, Inc. (NAAV) was established in 2005 to assist the severely wounded warriors, especially single parent service members, military caregivers, disabled veterans and their families by helping them access their benefits, improving communications and coordination for veterans and collaborating among health agencies, medical professional, organizations, educational organization and the general public.

survey found that 54% of Lifeline subscribers used the service to connect with doctors and for other health-related purposes.<sup>2</sup> Lifeline helps veterans manage chronic health conditions at home. Through Lifeline veterans can access video telemedicine services provided by the Veterans Health Administration to manage chronic conditions by monitoring vital signs and medications from home. Access to affordable communications services also makes some treatments for depression and post-traumatic stress disorder readily available to veterans 24/7.

Research shows that 74% of Lifeline subscribers enjoy broadband access on their smartphone or computer – allowing veterans to access online job boards and other online resources to help find work when they return home. As the Commission proceeds with its plan to modernize the Lifeline program to support broadband, the percentage of Lifeline subscribers who rely on Lifeline for affordable broadband Internet access will continue to increase. That increase will include veterans as well as active military personnel and their families. Lifeline increases access to veteran employment programs. Without affordable phone and broadband service, veterans can't set up phone and in-person interviews or receive the much-anticipated call or email that they got the job.

In its Notice of Proposed Rulemaking, the FCC proposes to limit Lifeline support to facilities-based broadband service provided to a qualifying low-income consumer over the ETC's voice and broadband-capable last-mile network and to discontinue Lifeline support for service provided over non-facilities-based providers. Exclusion of wireless resale providers from the Lifeline program would result in about 70 percent of current Lifeline customers losing access to essential telecommunication and broadband service. According to the Commission's 2016 Universal Service Monitoring Report, there are more than 12.5 million subscribers to the Lifeline program, 68.5 percent of whom obtain their service through non-facilities based providers.<sup>3</sup>

We also oppose the FCC's proposals which would impose a hard cap on overall Lifeline spending, and set a lifetime limit on individual Lifeline recipients. Implementing a hard cap on spending to a program that already has a low participation rate among qualified low-income households seems misguided. As advocates for veterans and members of the military, we fear that a cap which results in denial of benefits to otherwise qualified low-income households, would also deny those low-income Americans from receiving the important health care Lifeline services described in the preceding paragraphs. Even more concerning is the proposed lifetime limit on the receipt of Lifeline benefits, which would penalize individuals who may fall on hard times during different times in their lives. Indeed, imposing such a limit will disproportionately punish older low-income American veterans, who may find they again need Lifeline service later in life, but who will no longer be eligible to receive Lifeline-supported service.

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<sup>2</sup> Sprint April 10, 2013 ex parte letter to FCC (54% use their Lifeline service to stay in touch with doctors and for other health care-related purposes)

<sup>3</sup> Universal Service Monitoring Report 2016 (Data Received Through September 2016), Federal and State Staff for the Federal - State Joint Board on Universal Service, Federal Communications Commission, December 2016, pp. 22-30, [https://apps.fcc.gov/edocs\\_public/attachmatch/DOC-343025A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/DOC-343025A1.pdf)

For these reasons, we urge the FCC to reject these punitive proposals. Rationing Lifeline benefits and limiting service providers will harm our nation's veterans and military families. Please keep the Lifeline program's focus on people, and maintain affordable voice and broadband service for all.

Sincerely,

A handwritten signature in cursive script that reads "Constance A. Burns".

Constance A. Burns  
President, CEO and Veterans Service Officer  
Chair, Board of Directors